

LEONARD T. FINK, ESQ.
Nevada Bar No. 6296
NAKESHA S. DUNCAN-PEREZ, ESQ.
Nevada Bar No. 11556
CHAD D. FUSS, ESQ.
Nevada Bar No. 12744
SPRINGEL & FINK LLP
9075 W. Diablo Drive, Suite 302
Las Vegas, Nevada 89148
Telephone: (702) 804-0706
E-Mail: lfink@springelfink.com
nduncan@springelfink.com
cfuss@springelfink.com

Attorneys for Defendant,
SECURITAS SECURITY SERVICES USA, INC.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Case No. 2:21-cv-02102-JCM-DJA

JASON LOWE,
Plaintiff.

vs.

WALMART, INC. DBA WALMART
NEIGHBORHOOD MARKET #4339 a Nevada
Domestic Limited Liability Company;
SECURITAS SECURITY SERVICES USA, INC.,
a Foreign Corporation; DOES 1 through 30; ROE
BUSINESS ENTITIES1 through 30; DOE STAFF
MEMBERS 1 through 30, inclusive.

**STIPULATION AND ORDER TO DISMISS
PLAINTIFF'S COMPLAINT WITH
PREJUDICE**

Defendants

Defendant, SECURITAS SECURITY SERVICES USA, INC.'S ("SECURITAS"), Defendant, WALMART, INC. dba WALMART NEIGHBORHOOD MARKET #4339, and Plaintiff, JASON LOWE ("Plaintiff") by and through their respective counsels of record, stipulate that:

1. Plaintiff's Complaint against Defendants, and all amendments thereto, are dismissed with
2. prejudice; and
3. 2. Each party is to bear its own attorneys' fees and costs.

4. IT IS SO STIPULATED.

5. DATED this 23rd day of March, 2023.

DATED this 23rd day of March, 2023.

6. SPRINGEL & FINK LLP

RICHARD HARRIS LAW FIRM

7. */s/ Chad D. Fuss, Esq.*

/s/ Ian C. Estrada, Esq.

8. By:

LEONARD T. FINK, ESQ.

By:

IAN C. ESTRADA, ESQ.

Nevada Bar No. 6296

Nevada Bar No. 12575

NAKESHA S. DUNCAN-PEREZ, ESQ.

801 S. Fourth St.

Nevada Bar No. 11556

Las Vegas, NV 89101

CHAD D. FUSS, ESQ.

Attorneys for Plaintiff,

Nevada Bar No. 12744

JASON LOWE

Attorneys for Defendant,

*SECURITAS SECURITY SERVICES USA,
INC.*

14. DATED this 23rd day of March, 2023.

16. ALVERSON TAYLOR & SANDERS

17. */s/ Kurt Bonds, Esq.*

18. By:

KURT BONDS, ESQ.

Nevada Bar No. 6228

6605 Grand Montecito Pkwy., Ste. 200

Las Vegas, NV 89149

Attorney for Defendant,

WALMART, INC.

23. **ORDERED**

24. IT IS HEREBY ORDERED.

26. DATED April 3, 2023.

James C. Mahan
28.  UNITED STATES DISTRICT JUDGE

From: Ian Estrada
To: [Chad D. Fuss](#); [Madison Aguirre](#); [Nakesha Duncan-Perez](#); [Karina Rosas](#)
Cc: [Alma Duarte](#)
Subject: Re: Lowe v. Walmart/Securitas
Date: Wednesday, March 22, 2023 12:20:40 PM

Chad, please go ahead and use my e-signature.

And thanks for putting this together. (I know I said I'd do it; so, thank you)

Thanks,

Ian

From: Chad D. Fuss <cfuss@springelfink.com>
Date: Wednesday, March 22, 2023 at 12:16 PM
To: Madison Aguirre <MAguirre@AlversonTaylor.com>, Ian Estrada <ian@richardharrislaw.com>, Nakesha Duncan-Perez <nduncan@springelfink.com>, Karina Rosas <krosas@richardharrislaw.com>
Cc: Alma Duarte <aduarte@springelfink.com>
Subject: RE: Lowe v. Walmart/Securitas

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ian and Madison-

Attached is a draft stipulation to dismiss. Please let us know if we can use your electronic signatures on it.

Thank you.

Chad D. Fuss
Attorney



9075 W. Diablo Drive., Suite 302 | Las Vegas, NV 89148
Tel: [\(702\) 804-0706](tel:(702)804-0706) | Fax: [\(702\) 804-0798](tel:(702)804-0798)

From: Madison Aguirre <MAguirre@AlversonTaylor.com>
Sent: Thursday, March 16, 2023 8:40 AM
To: 'Ian Estrada' <ian@richardharrislaw.com>; Chad D. Fuss <cfuss@springelfink.com>; Nakesha

Duncan-Perez <nduncan@springelfink.com>; Karina Rosas <krosas@richardharrislaw.com>

Subject: RE: Lowe v. Walmart/Securitas

Good morning,

That is accurate.

Thank you.

Madison Aguirre |
Alverson Taylor & Sanders
702.384.7000 | alversontaylor.com

From: Ian Estrada <ian@richardharrislaw.com>
Sent: Wednesday, March 15, 2023 7:06 PM
To: Chad D. Fuss <cfuss@springelfink.com>; Nakesha Duncan-Perez <nduncan@springelfink.com>;
Madison Aguirre <MAguirre@AlversonTaylor.com>; Karina Rosas <krosas@richardharrislaw.com>
Subject: Lowe v. Walmart/Securitas

Chad and Madison,

This is to confirm that both of your clients have agreed to a walk away. Mr. Lowe will dismiss your clients with prejudice and each party will cover their own fees and costs.

If this is not accurate, please let me know.

I will circulate a SAO to Dismiss shortly.

Thanks,

Ian

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From: [Kurt Bonds](#)
To: [Chad D. Fuss](#); [Madison Aguirre](#); ["Ian Estrada"](#); [Nakesha Duncan-Perez](#); [Karina Rosas](#)
Cc: [Alma Duarte](#)
Subject: RE: Lowe v. Walmart/Securitas
Date: Wednesday, March 22, 2023 12:31:21 PM
Attachments: [image002.png](#)

This works for us on behalf of Walmart. Kurt.

Kurt Bonds, Esq.



6605 Grand Montecito Pkwy., Suite 200, Las Vegas, NV 89149
702.384.7000 **Office** | 702.385.7000 **Fax**

[website](#) | [bio](#) | [vCard](#) | [map](#) | [email](#)

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Chad D. Fuss
Attorney



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Ian

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